U.S. Application No. 10/665,312
Amendment and Response dated February 15, 2007
Response to Office Action dated November 16, 2006

REMARKS

In response to the Non-Final Office Action mailed on November 16, 2006, the Applicants sincerely request reconsideration in view of the above amendments to the claims and the following remarks. The claims as presented are believed to be in allowable condition.

Claims 1 and 4-17 are currently pending in the present application and are rejected under 35 U.S.C. § 103. Claim 8 is also rejected under 35 U.S.C. § 112. Claims 6-9 and 14 have been amended to further clarify the subject matter and correct minor informalities. New claim 18 has been added. No new matter is added by the new claim or amendments.

Claim Rejections Under 35 U.S.C. §112

Claim 8 is rejected under 35 U.S.C. § 112, second paragraph, for being dependent upon a cancelled claim. Claim 8 has been amended to depend from independent claim 1 and is in condition for allowance. Notice to that effect is respectfully requested.

Claim Rejections Under 35 U.S.C. §103

Claims 1 and 4-17 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2003/0014447 to White (hereinafter *White*), in view of U.S. Patent No. 6,580,438 to Ichimura, *et al.* (hereinafter *Ichimura*) and in further view of U.S. Publication No. 2003/0030645 to Ribak, *et al.* (hereinafter *Ribak*). Applicants respectfully traverse the rejections.

Applicants' claim 1 recites a method for formatting objects in a page of an electronic document that includes, *inter alia*, "receiving an input for the page in the electronic document", "tracking a position of the input relative to the page", "calculating the position of an object in a style sheet", "comparing the position of the input to the position of the object with predefined formatting", "determining a format for the input based on the position of the corresponding

U.S. Application No. 10/665,312
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object in the style sheet", and "applying the format to the input." Among other differences, *White, Ichimura*, and *Ribak* do not anticipate or teach these features of claim 1.

According to claim 1, a format for an input in a document is determined and applied based on a position of an object in a style sheet, where a position of the input relative to the page is tracked, the position of the object is calculated, and a comparison between the positions of the input and the object is made to determine the format for the input. Even if *White, Ichimura*, and *Ribak* can be combined, their teachings are completely different from the features of Applicants' claim 1.

White discloses a data management system for generating customized versions of data documents, where the document is initially stored as in the form of raw data, which is subsequently parsed into an internal representation of the document (*White*: Abstract and par. 0009, 0010). According to *White*, a document generator includes a document manager that includes a document table and a transform table. The document table of *White* contains rows of document records that identify and are used to read raw data documents from the raw document database. Similarly, the transform table of *White* contains rows of transform records that identify and are used to read transforms from the transform database (*White*: Fig. 4 and par. 0066). Thus, *White* does not disclose or teach any of the features of Applicants' claim 1.

Ichimura discloses methods and systems to manipulate presentation elements to create a unified display characteristic between the elements selected for presentation (*Ichimura*: Abstract; col. 2, lines 1-6). While *Ichimura* describes "[a] stylizer replaces the attributes of tags with the new attributes that correspond to the selected style", *Ichimura* also discloses "[t]he stylizer applies the selected or custom style to the presentation element with the cooperation of controller. In particular, the stylizer compares the detected presentation element type to a presentation <u>element attribute table</u>..." (emphasis added) (*Ichimura*: col. 6, lines 30-34). Moreover, *Ichimura* describes "the presentation element type identifier in conjunction with the controller determines if a style has previously been associated with the selected presentation element. If an associated style ... is not available, the stylizer in conjunction with the

U.S. Application No. 10/665,312
Amendment and Response dated February 15, 2007
Response to Office Action dated November 16, 2006

presentation element type identifier analyzes the presentation element to create a style based on that presentation element's display characteristics (*Ichimura*: col. 12, lines 12-20). If anything, *Ichimura* teaches away from Applicant's claim 1.

Thus, neither *White* nor *Ichimura*, alone or in combination, teach or suggest features of claim 1. For example, *White* and *Ichimura* fail to disclose at least tracking a position of the input relative to the page, calculating the position of an object in a style sheet, or comparing the position of the input to the position of the object with predefined formatting. In particular, the cited references do not teach or suggest determining a format for the input based on the position of the corresponding object in the style sheet.

Ribak discloses a method for visualizing data that includes receiving code representing content for display on the screen of a computer, the content including at least one hyperlink to other content and at least one attribute associated with the hyperlink (*Ribak*: Abstract and par. 0013). Specifically, *Ribak* teaches "an element in a document may have multiple hyperlinks of different types, each with its own verbosity characteristic. ... When the formatting styles conflict (as when different colors are used for different hyperlink types, for example), the document is preferably reformatted in order to resolve the conflict" (*Ribak*: Fig. 2A, 2B and par. 0043). Thus, *Ribak* teaches reformatting a document when formats conflict between the hyperlinks and the document. Contrary to *Ribak*, an input (graphic or text) is formatted according to a position of an object from a style sheet associated with the electronic document based on calculation of the position of the object within the style sheet and comparison of the object's position with a position of the input, according to claim 1. Thus, *Ribak* not only fails to teach or suggest features of amended claim 1 individually or in combination with the other two references, but *Ribak* also teaches away from the claimed invention by suggesting the document be preferably reformatted in order to resolve a conflict between styles of an input and the document.

Therefore, none of *White*, *Ichimura*, or *Ribak* teach, disclose, or suggest each and every feature specified in claim 1, and the claim is allowable. Claims 4-8 and new claim 18 depend

U.S. Application No. 10/665,312
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Response to Office Action dated November 16, 2006

from independent claim 1 and are thus allowable for at least the same reasons discussed above with respect to claim 1. Notice to that effect is respectfully requested.

Applicants' amended claim 9 recites a method for controlling page formatting of an electronic document that includes, *inter alia*, "determining formatting of the input by tracking a position of the input relative to the page, calculating the position of an object in a sheet stored in a computer memory comprising objects with a predefined formatting, and comparing the position of the input to a position of the object within the sheet, wherein at least one of the position and a type of the object in the sheet is used to determine the predefined formatting to be applied to the input for consistency of formatting within the electronic document" and "applying the predefined formatting to the input based on the corresponding object in the sheet."

As discussed above in more detail, *White*, *Ichimura*, and *Ribak*, individually or in combination, do not teach or suggest at least the calculating the position of an object in a sheet, comparing the position of the input to a position of the object within the sheet, and determining the predefined formatting to be applied to the input for consistency of formatting within the electronic document using at least one of the position and a type of the object in the sheet features of claim 9. Claim 9 and its dependent claims 10-13 are, therefore in condition for allowance. Notice to that effect is respectfully requested.

Applicants' amended claim 14 recites computer system for creating object in an electronic document that includes a program module with instructions for, *inter alia*, "comparing the input to a style sheet for controlling a format of the electronic document based on one or more objects within the style sheet with predefined formatting, wherein a position and a type of an object in the style sheet is used to determine a format to be applied to the input for consistency of the format of the electronic document" and "formatting the input within the electronic document in response to identifying the format in the style sheet based on the corresponding position of the identified object in the style sheet relative to the position of the input in the electronic document."

U.S. Application No. 10/665,312
Amendment and Response dated February 15, 2007
Response to Office Action dated November 16, 2006

As discussed above, *White*, *Ichimura*, and *Ribak*, individually or in combination, do not teach or suggest several features of claim 14 similar to claims 1 and 9. Claim 14 and its dependent claims 15-17 are, therefore in condition for allowance. Notice to that effect is respectfully requested.

U.S. Application No. 10/665,312
Amendment and Response dated February 15, 2007
Response to Office Action dated November 16, 2006

CONCLUSION

For at least the aforementioned reasons, the Applicants assert that the pending claims are in condition for allowance. The Applicants further assert that this response addresses each and every point of the Office Action, and respectfully requests that the Examiner pass this application to allowance. If the Examiner has any questions or comments concerning this matter, the Examiner is invited to contact the applicant's undersigned attorney at the number below.

Respectfully submitted,

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